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17 *Attorneys for Plaintiffs and the Proposed Class*

18  
19 UNITED STATES DISTRICT COURT  
20 CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION  
21  
22

23 *In re: Hyundai and Kia Engine*  
24 *Litigation*

CASE NO. 8:17-cv-00838

Member Cases:  
8:17-cv-01365-JLS-JDE  
8:17-cv-02208-JLS-JDE  
2:18-cv-05255-JLS-JDE  
8:18-cv-00622-JLS-JDE

Related Case:  
8:18-cv-02223-JLS-JDE

**JOINT NOTICE REGARDING  
FINAL APPROVAL**

The Hon. Josephine L. Staton  
Courtroom: 10A  
Trial Date: None Set

1 During the November 13, 2020 final approval hearing, the Court discussed  
2 obtaining additional information from the parties and/or possible revisions to the  
3 Settlement Agreement concerning the treatment of certain business entities that are  
4 Class Members, the trigger for the 60-day KSDS update window for Hyundai  
5 owners, and the administration of the settlement. The Parties intend to submit  
6 within the next 21 days a comprehensive proposal to address each of these issues,  
7 and provide here a brief interim update.

8  
9 **Settlement Treatment of Business Entities**

10 The Parties have been actively discussing possible courses of action  
11 with respect to certain commercial entity Class Members not subject to the Lifetime  
12 Warranty benefit under the Settlement Agreement, including the Court's inquiry that  
13 these entities be excluded from the Settlement. The parties understand the Court's  
14 concern and will address this issue in their upcoming submission.

15  
16 **KSDS Update Conditions**

17 The Settlement Agreement currently provides that Class Members who are  
18 Hyundai owners must have the KSDS "installed" within 60 days of the later of  
19 certain enumerated events to obtain Lifetime Warranty coverage. (Dkt. 128-1 at 5,  
20 6, 11-12.) At the final approval hearing, the Court expressed a preference that the  
21 triggering event for the 60-day deadline should be the scheduling of an appointment  
22 to obtain the KSDS update, not installation. The parties understand the Court's  
23 concern and will address this issue in their upcoming submission.

24  
25 **Update on Settlement Claims Processing**

26 The Court also expressed interest in an update on the claims processing status  
27 by both HMA and KMA to assess relative progress, among other considerations.

1 The parties believe claims processing will have advanced sufficiently to provide a  
2 meaningful joint progress report on or before December 17, 2020.

3  
4 DATED: November 28, 2020

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

5  
6 By /s/ Shon Morgan

7 Shon Morgan

8 *Attorneys for Hyundai Motor America,*  
9 *Hyundai Motor Company, Kia Motors*  
10 *America, and Kia Motors Corporation.*

1  
2 DATED: November 28, 2020

SAUDER SCHELKOPF LLC

3  
4 By /s/ Matthew D. Schelkopf

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**ECF ATTESTATION**

I, Shon Morgan, attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the e-filing of the foregoing document in compliance with Local Rule 5-4.3.4(a)(2).

By /s/ Shon Morgan  
Shon Morgan